



March 12, 2008



## Via Overnight Delivery

Hon. Deborah A. Batts United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Room 2510 New York, New York 10007

MEMO ENDOS

Re:

In re Lehman Brothers Holdings, Inc. Derivative Litigation USDC, SD NY, 07 Civ. 2990 (DAB)

## Dear Judge Batts:

I write pursuant to Rules I.A. and I.E of Your Honor's Individual Practices to request an extension to the due dates for filing of Responses to the two sets of Defendants' Motions to Dismiss. Plaintiffs' Responses are due on March 21, 2008. Plaintiffs respectfully request a 30 day extension for filing the Responses, making the Responses due on April 21, 2008. The request is made as a result of the complexity of the issues, and the length of the two legal memoranda to which Plaintiffs must respond. We would also ask the Court to provide Defendants with a 21 day extension for filing their Replies in Further Support of the Motions to Dismiss, making their Replies due on May 21, 2008. This is Plaintiffs' first request for an extension to the due date for filing their Responses to the Motious to Dismiss. Plaintiffs have conferred with Defendants on the issue, and Defendants have consented to the proposed extension to the due dates for filing the Responses and Replies.

Respectfully submitted.

MERIA CHINADOTT

Beth A. Kaswan

BK/as

cc:

James Gamble John M. Callagy

ATTORNEYS AT LAW

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SCOTT + SCOTT, JP 29 WEST STTH STREET NEW YORK, NY 10019 SO ORDERED

Deborah a. Batts

DEBORAH A. BATTS
UNITED STATES DISTRICT JUDGE
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GRANTE

/DAB